

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MONSANTO COMPANY,)
)
Plaintiff,) Case No. 4:18-cv-01787
v.)
)
JUSTICE FAMILY FARMS, LLC,)
)
Defendant.)

PLAINTIFF MONSANTO COMPANY'S
MOTION TO REQUEST CERTIFIED COPY OF SEALED JUDGMENT

Plaintiff Monsanto Company (“Plaintiff” or “Monsanto”), by and through its undersigned counsel, respectfully moves this Court for an Order granting Monsanto’s request for a certified copy of the consent judgment filed under seal in this case for purposes of executing this judgment against Defendant Justice Family Farms, LLC (“Defendant” or “Justice”) pursuant to 28 U.S.C. § 1963. In support of its motion, Monsanto states the following:

1. On January 30, 2019, Monsanto moved this Court to enforce the Confidential Settlement Agreement and Contingent Release of Liability (the “Settlement Agreement”) entered into by the parties and for entry of the agreed upon Final Consent Judgment in the amount of \$814,444.59, including late fees in amount of 18% APR running from November 25, 2017 until the full payment is made. *See Motion to Enforce Settlement Agreement and Entry of Final Consent Judgment*, at Dkt. No. 6.

2. Monsanto moved this Court to file its Motion to Enforce Settlement Agreement and Entry of Final Consent Judgment under seal “because the pleading incorporates and discusses confidential information related to settlement of this matter.” *See Motion for Leave to File Under Seal*, at Dkt. No. 5.

3. On January 31, 2019, this Court granted Monsanto's Motion for Leave to File Under Seal. *See* Order, at Dkt. No. 8.

4. On September 13, 2019, this Court granted Monsanto's Motion to Enforce Settlement Agreement and Entry of Final Consent Judgment and entered the Final Consent Judgment separately. *See* Memorandum and Order and Docket Text, at Dkt. Nos. 8 and 9.

5. Monsanto now seeks to enforce the Final Consent Judgment in, at least, the State of Virginia where Justice is currently situated.

6. In order to do so, Monsanto must obtain a certified copy of the sealed Final Consent Judgment. *See* 28 U.S.C. § 1963 ("A judgment in an action for the recovery of money or property entered in any court ... may be registered by filing a certified copy of the judgment in any other district... A judgment so registered shall have the same effect as a judgment of the district court of the district where registered and may be enforced in like manner.").

WHEREFORE, Plaintiff Monsanto Company prays for an Order granting Plaintiff's Motion to Request Certified Copy of Sealed Judgment, along with a certified copy of the sealed Final Consent Judgment, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

HUSCH BLACKWELL LLP

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Attorneys for Plaintiff Monsanto Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 28th day of February, 2020, the foregoing was filed electronically with the Clerk of the Court for the United States District Court for the Eastern District of Missouri, Eastern Division, and was served by U.S. mail, upon the following:

JUSTICE FAMILY FARMS, LLC
c/o CT Corporation System
2 Office Park Ct., STE 103
Columbia, South Carolina 29223

/s/ Matthew R. Grant